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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI
IN SUPPORT OF WAYMO'S OFFER OF
PROOF REGARDING ADMISSIBILITY
OF CERTAIN MARKET AND
FINANCIAL INFORMATION**

1 I, Jeff Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct excerpted copy of the September 7, 2017
7 Expert Report of E. Allen Jacobs.

8 3. Attached as Exhibit 2 is a true and correct copy of a document produced by Waymo
9 in this case bearing Bates number WAYMO-UBER-00004175.

10 4. Attached as Exhibit 3 is a true and correct copy of document produced by Waymo
11 in this case bearing Bates number WAYMO-UBER-00004108.

12 5. Attached as Exhibit 4 is a true and correct copy of document produced by Uber in
13 this case bearing Bates number UBER00064468.

14 6. Attached as Exhibit 5 is a true and correct copy of document produced by Stroz
15 Friedberg in this case bearing Bates number STROZ_R_000003106.

16 7. Attached as Exhibit 6 is a true and correct copy of document produced by Uber in
17 this case bearing Bates number UBER00070108.

18 8. Attached as Exhibit 7 is a true and correct excerpted copy of the June 16, 2017
19 deposition of John Bares.

20 9. Attached as Exhibit 8 is a true and correct copy of document produced by Anthony
21 Levandowski in this case bearing Bates number LEV_000777.

22 10. Attached as Exhibit 9 is a true and correct excerpted copy of the August 11, 2017
23 deposition of Cameron Poetzscher.

24 11. Attached as Exhibit 10 is a true and correct copy of document produced by Uber in
25 this case bearing Bates number UBER00069030.

26 12. Attached as Exhibit 11 is a true and correct excerpted copy of the August 1, 2017
27 deposition of Brian McClendon.

28

1 13. Attached as Exhibit 12 is a true and correct copy of document produced by Waymo
2 in this case bearing Bates number WAYMO-UBER-00031805.

3 14. Attached as Exhibit 13 is a true and correct copy of document produced by Uber in
4 this case bearing Bates number UBER00109871.

5 15. Attached as Exhibit 14 is a true and correct copy of document produced by Uber in
6 this case bearing Bates number UBER00060147.

7 16. Attached as Exhibit 15 is a true and correct copy of document produced by Uber in
8 this case bearing Bates number UBER00065989.

9 17. Attached as Exhibit 16 is a true and correct copy of document produced by Uber in
10 this case bearing Bates number UBER00060504.

11 18. Attached as Exhibit 17 is a true and correct excerpted copy of the July 27, 2017
12 deposition of Travis Kalanick.

13 19. Attached as Exhibit 18 is a true and correct copy of document produced by Uber in
14 this case bearing Bates number UBER00060321.

15 20. Attached as Exhibit 19 is a true and correct copy of document produced by Uber in
16 this case bearing Bates number WAYMO-UBER-00032541.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 DATED: January 26, 2018

/s Jeff Nardinelli
Jeff Nardinelli

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jeff Nardinelli.

/s/ Charles K. Verhoeven
Charles K. Verhoeven